

Title V Operating Permit
ANNUAL COMPLIANCE CERTIFICATION FORM
(Due each March 31)

Part 1C - Facility Information and Certification

*This form, or the equivalent information, is required with **all** Annual Compliance Certification submittals.)*

Facility Name: Refinishers, Inc.

Facility Location (street address and city): 111 East St., East City

Permit Issuance Date: May 1, 2003

Operating Permit Number: 03-TV-222

Facility File Number: 00-01-001

Reporting Period Start Date: May 1, 2003 End Date: December 31, 2003

	Responsible Official	Permit Contact Person
Name	Sam Smith	Sandra Larson
Title	President	Environmental Engineer
Mailing Address	111 East St. East City, IA 51111	111 East St. East City, IA 51111
Phone Number	409-222-2222	409-222-2222

Is the above information **different** from what is indicated on your most recent Title V Report (i.e. last Semi-Annual Monitoring Report, Annual Emissions Inventory, etc)? **Yes** ☐ **No** ☒

[If "Yes," please contact the DNR Air Quality Bureau at 515-242-5100 or your Linn or Polk County local program office. You may need to submit additional forms to update your Title V Permit]

Are you submitting this Annual Compliance Certification to also fulfill the reporting requirements for the **Title V Semi-Annual Monitoring Report**? **Yes** ☒ **No** ☐

*[If "No," by **March 31**, you must submit a separate Semi-Annual Monitoring Report. Remember that a Semi-Annual Monitoring Report is also due by **September 30** of each year]*

Please mail a signed copy of this report to **each** of these offices: **Air Quality Bureau** ☒;
DNR Field Office (or **local air program** office) ☐; **and EPA Region VII** ☐.

*Please **check** the appropriate box above to indicate the **addressee** for each copy submitted. You can find the addresses in the DNR Instructions and at the end of your Title V Permit.*

STATEMENT OF CERTIFICATION OF COMPLIANCE [As required by 567 IAC 22.107(4). The **Responsible Official**, as defined under 567 IAC 22.100, must sign each copy of this report]

"I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS DOCUMENT ACCURATELY REFLECT THE COMPLIANCE STATUS OF THIS FACILITY FOR THIS REPORTING PERIOD TO DATE, AND ARE TRUE, ACCURATE, AND COMPLETE."

Signature of RO

Signature of Responsible Official

Sam Smith

Print Name of Responsible Official

President

Title of Responsible Official

January 20, 2004

Date Signed

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Part 2C – Compliance Summary

*This form, or the equivalent information, is required with **all** Annual Compliance Certification submittals.*

Facility Name: Refiners, Inc. **Operating Permit Number:** 03-TV-222

Reporting Period - Start Date: May 1, 2003 **End Date:** Dec. 31, 2003

1. EMISSION POINT SPECIFIC CONDITIONS (Title V Permit - Part III)

a) Is your facility currently **in compliance** with all Emission Point Specific Conditions (Part III) stated in your Permit? **Yes** ☐ **No** ☒

*[If you answered "No" to this question, you must also submit **Part 6C** (Compliance Schedule).]*

b) Did your facility experience **any** deviations during the reporting period from the Emission Point Specific Conditions stated in your Permit? **Yes** ☒ **No** ☐

*[If you answered "Yes" to this question, you must also complete **Part 4C** (Deviation Report) and/or **Part 5C** (Additional Reports Summary). See **DNR Instructions** for details.]*

NOTE: Even if your facility experiences **no** deviations, you must still complete **Part 3C-1** (Compliance Report – By Emission Unit). See the **DNR Instructions** for details.

2. PLANT-WIDE CONDITIONS (TITLE V PERMIT - PART II)

a) Is your facility currently **in compliance** with all Plant-wide Conditions (Part II) stated in your Permit? **Yes** ☒ **No** ☐

*[If you answered "No" to this question, you must also submit **Part 6C** (Compliance Schedule)]*

b) Did your facility experience **any** deviations during the reporting period from the Plant-Wide Conditions stated in your Permit? **Yes** ☐ **No** ☒

*[If you answered "Yes" to this question, you must also complete **Part 4C** (Deviation Report) and/or **Part 5C** (Additional Reports Summary). See **DNR Instructions** for details.]*

NOTE: If a Plant-Wide Condition contained in your Permit requires **monitoring**, you must include the information in **Part 3C-1** (just indicate "plant-wide" under the EP# and EU# columns).

3. GENERAL CONDITIONS (TITLE V PERMIT - PART IV)

a) Is your facility currently **in compliance** with all General Conditions (Part IV) stated in your Permit? **Yes** ☒ **No** ☐

*[If you answered "No" to this question, you must also submit **Part 6C** (Compliance Schedule)]*

b) Did your facility experience **any** deviations during the reporting period from any of the General Conditions stated in your Permit? **Yes** ☐ **No** ☒

*[If you answered "Yes" to this question, you must also complete **Part 4C** (Deviation Report) and/or **Part 5C** (Additional Reports Summary). See **DNR Instructions** for details.]*

4. STATEMENT OF COMPLIANCE STATUS

Based on the information provided above and throughout this Certification, indicate your facility's compliance status with the Permit during this reporting period.

Continuous Compliance ☐ **Intermittent Compliance** ☒

*[If your facility experienced **any** deviations during the reporting period, you must check Intermittent Compliance. If there were no deviations, you may check Continuous Compliance.]*

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Part 3C-1 – Compliance Report [By Emission Unit]

*This form, or the equivalent information, is required with **all** Annual Compliance Certification submittals.*

Facility Name: Refinishers, Inc. **Operating Permit Number:** 03-TV-222

Reporting Period - Start Date: May 1, 2003 **End Date:** December 31, 2003

Please see the DNR Instructions for details on completing this form. An example is included in Appendix B of the DNR Instructions.

(1) EP#	(2) EU#	(3) Pollutant (If appl.)	(4) Permit Term, Condition or Applicable Requirement	(5) Monitoring Method* (if appl.)	(6) Other Method Used to Determine Compliance (if appl.)	(7) Deviations? (Y) or (N)**	(8) If Deviations, note which form(s) contain information ⁺	(9) In Compliance? (Y) or (N)**
EP1-EP4	EU1-EU4	PM PM10	Max. solids in all materials not to exceed 1.5 lb/gallon	RR	N/A	No	N/A	Y
EP1-EP4	EU1-EU4	PM PM10	0.01 gr/dscf 0.19 lb/hr	ST	N/A	No	N/A	Y
EP1-EP4	EU1-EU4	Opacity	40%	N/A	NVE – We have employees take VEs daily on stack.	No	N/A	Y
EP1-EP4	EU1-EU4	VOC	200 tons/yr	RR	N/A	No	N/A	Y
EP1-EP4	EU1-EU4	VOC	55,000 gallons limit on spray material – 12 mo. Rolling total.	RR	N/A	No	N/A	Y

Attach additional pages, as needed. [If more than one page is submitted, indicate **Page** 1 **of** 2]

* **Monitoring Method Abbreviations (#5):** Recordkeeping (RR), Source Testing (ST), Continuous Emissions Monitoring (CEMS), Continuous Opacity Monitoring (COMS), No Visible Emissions (NVE), Method 9 Opacity Observations (OP), and Operation & Maintenance Plans (OMP).

** **Deviations (#7)?:** Indicate (Y) for Yes, or (N) for No. If you indicate (Y), you **must** complete **Part 4C** and/or **Part 5C**.

⁺ **If Deviations...(#8):** If you marked (Y) for #7, note which form describes the deviations by indicating (4C), (5C), or (4C & 5C).

⁺⁺ **In Compliance (#9)?:** If you indicate (N), you must complete **Part 6C**.

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Part 3C-1 – Compliance Report [By Emission Unit]

*This form, or the equivalent information, is required with **all** Annual Compliance Certification submittals.*

Facility Name: Refinishers, Inc. **Operating Permit Number:** 03-TV-222

Reporting Period - Start Date: May 3, 2001 **End Date:** December 31, 2003

Please see the DNR Instructions for details on completing this form. An example is included in Appendix B of the DNR Instructions.

(1) EP#	(2) EU#	(3) Pollutant (If appl.)	(4) Permit Term, Condition or Applicable Requirement	(5) Monitoring Method* (if appl.)	(6) Other Method Used to Determine Compliance (if appl.)	(7) Deviations? (Y) or (N)**	(8) If Deviations, note which form(s) contain information ⁺	(9) In Compliance? (Y) or (N)**
EP1-EP4	EU1-EU4	VOC	VOC content not to exceed 7.2 lb/gallon on any spray material	RR	N/A	Y	4C & 5C	Y
EP1-EP4	EU1-EU4	VOC	Keep records showing 12-mo. rolling total of gallons spray material used.	N/A	N/A	Y	4C & 5C	Y
EP1-EP4	EU1-EU4	PM PM10	Agency O&M Plan for filters and spray equipment	RR	N/A	Y	4C	No
EP1-EP4	EU1-EU5	PM PM10	Keep records of all inspections and corrective action under O&M	N/A	N/A	Y	4C	No

Attach additional pages, as needed. [If more than one page is submitted, indicate **Page** 2 **of** 2]

* **Monitoring Method Abbreviations (#5):** Recordkeeping (RR), Source Testing (ST), Continuous Emissions Monitoring (CEMS), Continuous Opacity Monitoring (COMS), No Visible Emissions (NVE), Method 9 Opacity Observations (OP), and Operation & Maintenance Plans (OMP).

** **Deviations (#7)?:** Indicate (Y) for Yes, or (N) for No. If you indicate (Y), you **must** complete **Part 4C** and/or **Part 5C**.

⁺ **If Deviations...(#8):** If you marked (Y) for #7, note which form describes the deviations by indicating (4C), (5C), or (4C & 5C).

⁺⁺ **In Compliance (#9)?:** If you indicate (N), you must complete **Part 6C**.

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Part 3C-2 – Compliance Report [By Permit Requirement]

*This form is **optional**. Use this form to describe the compliance status of emission units that are subject to an **identical** applicable requirement.*

Facility Name: Refinishers, Inc **Operating Permit Number:** 03-TV-222

Reporting Period - Start Date: May 3, 2001 **End Date:** December 31, 2003

Any emission units listed on this form must:

- ◆ Be subject to the **same** applicable requirement; AND
- ◆ Be subject to the **same** monitoring requirement (or have **no** monitoring requirements); AND
- ◆ Have experienced **no** deviations from the requirement listed, AND
- ◆ Be currently **in compliance** with the listed requirement.

[Use **Part 3C-1** for all emission units that do **not** meet this criteria]

Pollutant (If appl.)	Permit Term, Condition or Applicable Requirement	Monitoring Method* (if appl.)
Fugitive Dust	Fugitive Dust Standard [567 IAC 23.3(2) "c"]	N/A

List emission unit numbers as indicated in the Permit -

Emission Unit #	EU5- EU9*									
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*All welding units

***Monitoring Method Abbreviations:** Recordkeeping Requirements (RR), Source Testing (ST), Continuous Emissions Monitoring (CEMS), Continuous Opacity Monitoring (COMS), No Visible Emissions (NVE), Method 9 Opacity Observations (OP), and Operation & Maintenance Plans (OMP).

[Attach additional pages, as needed. [If more than one page is submitted, indicate **Page 1 of 1]**

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Part 4C – Deviation Report

*This form, or the equivalent information, is required **only** if deviations occurred during the reporting period.*

Facility Name: Refinishers, Inc. **Operating Permit Number:** 03-TV-222

Reporting Period - Start Date: May 1, 2003 **End Date:** December 31, 2003

You may be able to use Part 5C to report some or all deviations. Please see the DNR Instructions, and Part 5C, for details.

(1) EP# (if appl.)	(2) EU# (if appl.)	(3) Pollutant (if appl.)	(4) Deviation Description	(5) Deviation Date	(6) Deviation Duration	(7) Suspected Cause of Deviation	(8) Corrective Action Taken
EP1-EP4	EU1-EU4	PM PM10	Did not conduct filter inspections as required by O&M	12/15/03	Current	Short staffed – employees not trained in requirements	Conducting training and setting up database and manual log. Should be complete by 1/30/04
EP1-EP4	EU1-EU4	PM PM10	Did not record any filter inspections as required by O&M	12/15/03	Current	Same as above	Same as above
EP1-EP4	EU1-EU4	VOC	Gallons usage not calculated by 12-mo rolling total	5/1/03	3 months (until 7/31/01)	Employees not trained in 12-mo rolling set-up and calculations	Set up spread sheet to enter and calculate monthly totals. Determined that 55,000 gallon limit was not exceeded.
EP1-EP4	EU1-EU4	VOC	Purchased and used material w- VOC content of 8.0 lbs/gallons	6/1/03	8 weeks (until 7/31/01)	Purchasing oversight	Immediately ceased use upon discovery. Trained staff. Determined that 12-mo. rolling did not exceed 200 tons/yr VOC limit.

Attach additional pages, as needed. [If more than one page is submitted, indicate Page 1 of 1]

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Part 5C – Additional Reports Summary

*This form is **optional**. Use this form to reference **other** deviation or exceedance reports submitted for this reporting period.*

Facility Name: Refinishers, Inc. **Operating Permit Number:** 03-TV-222

Reporting Period - Start Date: May 1, 2003 **End Date:** December 31, 2003

If you use this form to note deviations, please complete the table below to summarize other reports submitted to DNR Air Quality Bureau (or the Linn or Polk County air program) for this reporting period.

NOTE: The other reports referenced below should include, at a minimum, the information required in **Part 4C** for each deviation. If these reports do **not** contain this information, you must report the deviation on **Part 4C**.

Emission Unit Description	Emission Unit #	Reporting Requirement*	Date Report Submitted
Spray Booths	EU1-EU4	Title V Semi-Annual Monitoring Report	8-31-03

Attach additional pages, if needed. [If more than one page is submitted, indicate **Page 1 of 1**]

**Other deviation or exceedance reports submitted to AQB may include, but are not limited to, the following:*

- ◆ **Title V Semi-Annual Monitoring Reports;**
- ◆ **CEMS and/or COMS reports;**
- ◆ **Written reports of excess emission incidents;**
- ◆ **NSPS, NESHAP and/or MACT reports;**
- ◆ **PSD reporting requirements; or**
- ◆ **DNR Construction Permit reporting requirements**

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Part 6C – Compliance Schedule

*This form, or the equivalent information, is required **only** if your facility is currently **out of compliance** with the Title V Permit.*

Facility Name: Refinishers, Inc. **Operating Permit Number:** 03-TV-222

Reporting Period: Start Date: May 1, 2003 End Date: December 31, 2003

If you are currently **out of compliance** with your Title V Operating Permit, you **must** submit a compliance schedule. There is no specific format for your compliance schedule. You must, however, submit the minimum information as specified for an Annual Compliance Certification under the General Conditions (Part IV) section of your Permit.

Section G4 of the Title V Permit states:

For sources determined not to be in compliance at the time of compliance certification, a compliance schedule shall be submitted which provides for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures.

Please provide the following information for **each** compliance schedule you submit:

- ◆ **Term, condition, or applicable requirement** with which your facility is currently out of compliance;
- ◆ **Date** non-compliance with the Permit requirement began;
- ◆ **Description** of the non-compliance;
- ◆ **Cause** of non-compliance;
- ◆ **Corrective actions** taken to bring your facility back into compliance;
- ◆ **Schedule**, with specific dates, for submitting progress reports; and
- ◆ **Date** by which your facility will be **back in compliance** with this requirement.

Compliance Plan for EU1-EU4 (Spray booths)

O&M inspection requirements and recordkeeping were not conducted from December 15, 2003 through the present. We had new staff operating the equipment that had not been trained in requirement. We realized that we needed a training plan for all staff, as well as an easy and workable recordkeeping system. We have been short-staffed, so were not able to get back into compliance immediately. It should be noted that the plant was shut down from Dec. 25-27, and Jan. 1, so deviations did not occur on those dates.

We have implemented a training plan, computerized spreadsheet, and back-up manual log containing all O&M inspection and recording requirements. The training of employees and finalization of recordkeeping procedure will be complete as of January 31, 2004. We will resume recordkeeping at that time, and will be back in compliance on that date. We do not expect any additional violations once the new training and recordkeeping procedures are implemented.